

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA**

IN RE: AQUEOUS FILM-FORMING FOAMS	) Master Docket No.:
PRODUCTS LIABILITY LITIGATION	) 2:18-mn-2873-RMG

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CITY OF CAMDEN, et al.,	) Civil Action No.:
	) 2:23-cv-03147-RMG
<i>Plaintiffs,</i>	)
	)
v.	)
	)
3M COMPANY,	)
	)
<i>Defendant.</i>	)

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**CONSENT MOTION TO AMEND EXHIBITS E AND F  
TO PRELIMINARILY APPROVED 3M SETTLEMENT AGREEMENT**

Plaintiffs, City of Camden, City of Brockton, City of Sioux Falls, California Water Service Company, City of Del Ray Beach, Coraopolis Water & Sewer Authority, Township of Verona, Dutchess County Water & Wastewater Authority and Dalton Farms Water System, City of South Shore, City of Freeport, Martinsburg Municipal Authority, Seaman Cottages, Village of Bridgeport, City of Benwood, Niagara County, City of Pineville, and City of Iuka (collectively, “Plaintiffs”), by and through Class Counsel, and with the consent of Defendant 3M Company (“3M”), move to amend Exhibit E and Exhibit F to the Settlement Agreement Between Public Water Systems and 3M Company (the “3M Settlement Agreement”). The grounds for this motion are as follows:

1. On July 3, 2023, Plaintiffs filed a Motion for Preliminary Approval of Class Settlement, for Certification of Settlement Class and for Permission to Disseminate Class Notice (the “Preliminary Approval Motion”) (2:23-cv-03147 ECF No. 10, also filed as 2:18-mn-2873 ECF No. 3370) and the 3M Settlement Agreement (Ex. 2 to same, ECF No. 10-3/ECF No. 3370-3).

2. On August 28, 2023, the Parties submitted a Consent Motion to Amend Exhibits to Motion for Preliminary Approval (ECF No. 59/ECF No. 3620). Among the agreed revisions were changes to the lists of Phase One Eligible Claimants (Ex. E to the 3M Settlement Agreement) and Phase Two Eligible Claimants (Ex. F to same) intended to reflect more current and accurate information.

3. On August 29, 2023, the Court granted preliminary approval of the 3M Settlement Agreement, as revised. (ECF No. 65/ECF No. 3626.)

4. The Parties submit the attached exhibits in order to reflect more accurate lists of Phase One Eligible Claimants (Ex. E to the 3M Settlement Agreement) and Phase Two Eligible Claimants (Ex. F to same), attached hereto as Exhibits 1 and 2, respectively.

Accordingly, the Parties respectfully request that this Court grant this motion and order that the attached Exhibits E and F supersede the prior versions of those exhibits.

Dated: November 10, 2023

Respectfully submitted,

/s/ Richard F. Bulger

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*Class Counsel*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on November 10, 2023, a copy of the foregoing Consent Motion to Amend Exhibits E and F to Preliminarily Approved 3M Settlement Agreement was electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Richard F. Bulger  
Richard F. Bulger